

MEMORANDUM

DATE: April 18, 2001

TO: Division of Shellfish Sanitation Staff

FROM: Robert E. Croonenberghs, Ph.D., Director
Division of Shellfish Sanitation

THROUGH: Robert W. Hicks, Director
Office of Environmental Services

THROUGH: E. Anne Peterson, MD, MDH
State Health Commissioner

SUBJECT: Crab Meat Plants - Policy - Adoption of the HACCP Rule as Policy

Purpose

The purpose of this working memo is to adopt the Federal HACCP Rule as one of the standards used by the Department of Health in its evaluation of crab meat processing facilities.

Discussion

The legal basis for the crab meat program in Virginia is contained in sections 28.2-800 - 825 of the *Code of Virginia* (the *Code*). Further, §28.2-806 of the *Code* specifically states that "The State Health Commissioner may establish and change standards, examinations, analysis and inspections which control the taking and marketing from a health standpoint, of crustacea, finfish or shellfish."

The Department has two sets of regulations and one set of standards for the sanitary control of the processing of crab meat. The existing regulations are the *Rules and Regulations for the Sanitary Control of the Picking, Packing and Marketing of Crab Meat for Human Consumption* and the *Regulations for the Repacking of Crab Meat*. The existing standards are the *Sanitation of the Picking, Packing and Marketing of Crab Meat*.

While these regulations and standards address the sanitary aspects of the processing of crab meat, except for the repacking of crab meat, they do not address the Hazard Analysis and Critical Control Point (HACCP) concept widely used today in the food processing industry. The U.S. Food and Drug Administration published the final version of the Seafood HACCP Rule in the *Code of Federal Regulations* on 12/18/1995, which had an effective date of 12/18/1997. This means that all seafood processing plants, including crab meat processing plants, must follow the requirements of the rule.

The Seafood HACCP Rule requires all such facilities to develop a HACCP plan. This plan must contain the following elements at a minimum:

1. A hazard analysis
2. The identification of preventive measures
3. The identification of critical control points
4. The establishment of critical limits for each critical control point
5. The monitoring records of each critical control point
6. The establishment of corrective action when a critical limit deviation occurs
7. The establishment of verification procedures
8. The establishment and maintenance of a record-keeping system

The Seafood HACCP Rule also requires training in HACCP for individuals that conduct certain operations and requires that each processor conducts sanitation monitoring and maintains records of this monitoring. The conditions and practices to be monitored include, at a minimum:

1. Safety of the water used in processing
2. Condition and cleanliness of food contact surfaces
3. Prevention of cross-contamination
4. Maintenance of hand washing, hand sanitizing and toilet facilities
5. Protection of food and food contact surfaces from toxic substances
6. Proper labeling, storage and use of toxic compounds
7. Control of employee health conditions that could result in the microbial contamination of food
8. Exclusion of pests from the facility

The Division tries to regulate both the shellfish and crab meat industries with similar policies since many food safety concepts apply to both industries and since many of the facilities that the Division regulates conduct both shellfish and crab meat processing operations. The National Academy of Sciences has recommended that the HACCP approach be mandatory for food processors, and FDA requires it for all seafood facilities. Furthermore, the National Shellfish Sanitation Program requires the implementation of HACCP in all bivalve molluscan shellfish facilities. Therefore, it is prudent for the Department to adopt the applicable Seafood HACCP Rule requirements as part of its standards for the regulation of the crab meat industry.

Conclusion:

Pursuant to §28.2-806 of the *Code*, this working memo establishes that the Virginia Department of Health shall adopt, as a standard, the requirements of the FDA Seafood HACCP Rule, 21 CFR Part 123, Subpart A. Sections 123.3 - 123.12 as they relate to the processing of crab meat.